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14 UNITED STATES DISTRICT COURT
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16 NORTHERN DISTRICT OF CALIFORNIA
17
18 SAN JOSE DIVISION

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20 UNITED STATES OF AMERICA,) CASE NO. 15-CR-00226-BLF
21 Plaintiff,)
22 v.) JOINT STIPULATION FOR EXCLUSION OF
23 DOUGLAS STROMS YORK,) TIME FROM MAY 26, 2015, TO JUNE 9, 2015,
24 Defendant.)) PROPOSED ORDER TO EXCLUDE TIME FROM
25) MAY 26, 2015, TO JUNE 9, 2015
26)
27)
28)

19
20 JOINT STIPULATION

21 On May 26, 2015, the parties appeared before the Honorable Beth L. Freeman for an initial
22 status conference. At the hearing, defense counsel informed the Court that additional time is needed for
23 investigation to evaluate issues relating to the defendant's case. Therefore, the matter was continued
24 until June 9, 2015 at 8:30 a.m. for further status conference.

25 The parties hereby stipulate that the time between May 26, 2015, and June 9, 2015, at 8:30 a.m.,
26 should be excluded from the calculation of time within which the trial in this case must commence
27 pursuant to the Speedy Trial Act, in order to allow each counsel sufficient time to effectively prepare,
28 taking into account the exercise of due diligence. Furthermore, the parties stipulate that the ends of

JOINT STIPULATION FOR EXCLUSION OF TIME AND [PROPOSED] ORDER TO EXCLUDE TIME
CR 15-00226 BLF

1 justice served by granting the request outweigh the best interest of the public and the defendant in a
2 speedy trial.

3 DATED: May 28, 2015

Respectfully submitted,

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6 MELINDA HAAG
7 United States Attorney

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9 /s/ BRIANNA L. PENNA
10 Special Assistant United States Attorney

11 DATED: May 28, 2015

12 /s/ GRAHAM ARCHER
13 Attorney for the Defendant

14 **PROPOSED ORDER**

15 Pursuant to the parties' motion, the Court HEREBY ORDERS that the time between May 26,
16 2015, and June 9, 2015 be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. The Court finds,
17 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), that the failure to grant the requested continuance
18 would deny counsel the reasonable time necessary for effective preparation, taking into account the
19 exercise of due diligence.

20 Furthermore, the Court finds that the ends of justice served by granting the requested
21 continuance outweigh the best interest of the public and the defendant in a speedy trial. The Court
22 therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and
23 (B)(iv).

24 IT IS SO ORDERED.

25 DATED: R } ^AFAGEFI

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BETH L. FREEMAN
United States District Judge